

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

IN RE  
  
**CARLOS MANUEL DECLET JIMENEZ**  
  
DEBTOR

CASE NO 14-03403 ESL

CHAPTER 11

**MOTION FOR CONTINUANCE OF AUTOMATIC STAY**

**TO THE HONORABLE COURT**

COMES NOW Debtor through the undersigned attorney and respectfully moves this court, pursuant to 11 USC § 362(c)(3)(B), for an order continuing the automatic stay provided under 11 USC § 362(a):

1. On April 29<sup>th</sup>, 2014 Debtor filed a Bankruptcy petition under the Chapter 11 of the Title 11 of the United States Code. See Docket No. 1.
2. Debtor had previously filed a Bankruptcy petition under Chapter 13 on January 17<sup>th</sup>, 2014. See Case No. 14-00258.
3. The petition in this case has been filed in good faith and Debtor's prior Chapter 13 Bankruptcy petition was the only previous case by the Debtor that was pending during the preceding year.
4. For the reasons stated above, Debtor respectfully request from this Honorable Court to grant the continuance of the automatic stay.

**WHEREFORE**, Debtors respectfully requests from this Honorable Court to enter an order continuing the automatic stay provided under 11 USC § 362(a).

**NOTICE**

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the clerk's office of the United States Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the court, the interest of justice requires otherwise.

**I HEREBY CERTIFY** that the foregoing motion has been electronically filed through CM/ECF electronic filing system which will serve the same to the Chapter 11 Trustee and all parties in interest as per the master address list.

**RESPECTFULLY SUBMITTED,**

In San Juan, Puerto Rico, this 1<sup>st</sup> day of May, 2014.

**/s/ HECTOR FIGUEROA VINCENTY**

**HECTOR FIGUEROA VINCENTY**

USDC 120006

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